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RS

Site:	Citizens Gas + Electric
ID #:	IA0984589093
Break:	1.0
Other:	4-9-07

## MEMORANDUM

Date: April 9, 2007

Subject: Ron King Archiving Sites without due process.

To: Lynette Motley  
IANE

From: Ronald King *R. King*  
EFLR

Attached is a list of sites that I have unilaterally archived from CERCLIS without following the SOP. My reason for doing this activity was to continue the data cleanup that I had started to meet the April 20, 2007 pull for the site assessment data quality report. Although this archiving activity was separate from the data quality report, while I was doing data quality review, I was concern about continuing to carry these old sites for archiving.

The sites that I archived are sites that have not have an activity conducted since 2001 or earlier and/or sites that have had all a removal activities and cost recovery activities completed since 2002. Some of the sites that I archived dated back to 1980.

Another factor is my decision to archive was the resources that would be expended to achieve the archive concurrence for these very old sites. I have estimated that for each site there is a total of 8 hours of level-of-effort spent by all parties involved in the process. I don't believe this is a good use of resources and funding to make a decision on sites that haven't had any activities conducted for a long time and those removal sites that had no state involvement.

Please note that while I was archiving these sites, I also placed a completion date on the records management action code for those sites that had this action code in the site schedule.

As you will note the majority of these site are in Iowa. Over the next several months, I plan to do the same activity for the other three states unless you see a major concern.



Site Name	OU	Action Name	Planned Start	Planned Complete	Actual Start	Actual Complete
<b>290TH STREET MERCURY SPILL</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>AMES LABORATORY</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>ANDERSON EXCAVATNG COUNCIL BLUFFS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>BELLE PLAINE COAL GASIFICATION</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>BURLINGTON COAL GAS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>C &amp; M AG-CORWITH IA</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CASE, J I COMPANY</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CEDAR RAPIDS FMGP - LINN CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CEDAR RAPIDS SEWAGE TREATMENT PLANT</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CEDAR TOWNSHIP</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CITIZENS GAS &amp; ELECTRIC CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CLARKE CO. IA PESTICIDE</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CLARKSVILLE PCB</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CLEAR LAKE COAL GAS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>COGGON CREAMERY</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CONTINENTAL CEMENT</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>CURTIS ANIMAL HEALTH PRODUCTS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DAYCO PRODUCTS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DEA-ST. LOUIS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DES MOINES ENDRIN</b>						
	00 001	ARCHIVE SITE				04/06/2007



Site Name	OU	Action Name	Planned Start	Planned Complete	Actual Start	Actual Complete
<b>DODGE PARK - COUNCIL BLUFFS LEAD</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DRUG ENFORCEMENT ADMINISTRATION</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DUBUQUE MUNICIPAL LANDFILL</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>DUNDEE CEMENT CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>E.M PEAT MFG. CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>FDA-KANSAS CITY SITE</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>FORMER DILLER BATTERY</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>FRIT INDUSTRIES (HUMBOLDT PLANT)</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>HARRIETT ST LANDFILL</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>IOWA MALLEABLE IRON CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>ISU FOUNDRY SITE</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>JOHNSON STREET DUMP</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>KEY CITY GAS CO</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>KIRON DOUBLE CIRCLE</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MARSHALLTOWN INSTRUMENTS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MAYFAIR CLEANERS</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MICHAEL BATTERY (FARRAGUT)</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MICHAEL BATTERY (ROCKINGHAM)</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MICHAEL BATTERY (ROLFF)</b>						
	00 001	ARCHIVE SITE				04/06/2007
<b>MICHAEL CO (BETTENDORF)</b>						
	00 001	ARCHIVE SITE				04/06/2007

Site Name	OU	Action Name	Planned Start	Planned Complete	Actual Start	Actual Complete
NEBRASKA NATIONAL FOREST SITE #1						
	00 001	ARCHIVE SITE				04/06/2007
NGPCA - EMERSON - 107						
	00 001	ARCHIVE SITE				04/06/2007
NGPCA - KNOXVILLE - 198						
	00 001	ARCHIVE SITE				04/06/2007
NGPCA - LETTS - 199						
	00 001	ARCHIVE SITE				04/06/2007
NORTHWEST FARM SERVICE CO						
	00 001	ARCHIVE SITE				04/09/2007
NORTHWEST FARM SUPPLY						
	00 001	ARCHIVE SITE				04/09/2007
PACIFIC ACTIVITIES LIMITED						
	00 001	ARCHIVE SITE				04/09/2007
PRIES ENTERPRISES						
	00 001	ARCHIVE SITE				04/09/2007
R W COMMERCIAL PLAZA						
	00 001	ARCHIVE SITE				04/09/2007
RADIUM PETROLEUM CO - FT DODGE						
	00 001	ARCHIVE SITE				04/09/2007
SAFETY KLEEN CORP - DAVENPORT						
	00 001	ARCHIVE SITE				04/09/2007
SCHUSTER FARM						
	00 001	ARCHIVE SITE				04/06/2007
SIDNEY SINCLAIR SITE						
	00 001	ARCHIVE SITE				04/09/2007
SIOUX CITY (EX) ARMY AIR BASE / (ANG)						
	00 001	ARCHIVE SITE				04/09/2007
SNAP-ON TOOLS - SIOUX CITY						
	00 001	ARCHIVE SITE				04/09/2007
SOUTH FEDERAL RESIDENCES						
	00 001	ARCHIVE SITE				04/09/2007
STANDARD CHEMICAL CO						
	00 001	ARCHIVE SITE				04/09/2007
TIPTON POWER PLANT						
	00 001	ARCHIVE SITE				04/09/2007
TRAVIS INDUSTRIES						
	00 001	ARCHIVE SITE				04/09/2007
TRELLEX MORSE - KEOKUK						
	00 001	ARCHIVE SITE				04/09/2007

Site Name	OU	Action Name	Planned Start	Planned Complete	Actual Start	Actual Complete
TRIGGS TRAILER - BELMOND FACILITY						
	00 001	ARCHIVE SITE				04/09/2007
US POST OFFICE DES MOINES						
	00 001	ARCHIVE SITE				04/06/2007
USI CHEMICAL CO						
	00 001	ARCHIVE SITE				04/09/2007
VIGORO INDUSTRIES - BANCROFT						
	00 001	ARCHIVE SITE				04/09/2007
WEISMANN PCB'S						
	00 001	ARCHIVE SITE				04/09/2007
WEITZ PROPERTIES						
	00 001	ARCHIVE SITE				04/09/2007
WELLSBURG ELEVATOR						
	00 001	ARCHIVE SITE				04/09/2007
WILLIAMS PIPE LINE CO - DUBUQUE						
	00 001	ARCHIVE SITE				04/09/2007
WILLIAMS PIPE LINE CO - WATERLOO						
	00 001	ARCHIVE SITE				04/09/2007
WINFIELD CHEMICAL BURIAL SITE						
	00 001	ARCHIVE SITE				04/09/2007
WINNEBAGO DRUM SITE						
	00 001	ARCHIVE SITE				04/09/2007